

EXHIBIT A

IN THE UNITED STATES DISTRICT COURT FOR
THE MIDDLE DISTRICT OF PENNSYLVANIA

JUSTINA CHAPPELL,)
AS ADMINISTER OF THE ESTATE)
OF DELYLE WALTER CHAPPELL,)
Plaintiff,)

v.)

C.A. No. 3:23-cv-00604-RDM

)
PRECISION DRILLING)
CORPORATION, PRECISION)
DRILLING COMPANY, LP,)
CABOT OIL & GAS CORPORATION,)
COTERRA ENERGY, INC.,)
FORUM ENERGY)
TECHNOLOGIES, INC., AND FORUM)
ENERGY SERVICES, INC.)
Defendants.)

DECLARATION OF MIKE SKUCE

In accordance with 28 U.S.C. § 1746, I declare as follows:

1. My name is Mike Skuce I am over the age of twenty-one and am fully competent to make this declaration.

2. I am employee of Precision Drilling Company, LP. By virtue of my job duties and position, I am and familiar with the corporate structure of Precision Drilling Company, LP and its parent company. I am also familiar with the incident giving rise to this lawsuit.

3. Precision Drilling Corporation is the ultimate parent company of Precision Drilling Company, LP. Precision Drilling Corporation is incorporated in Canada, and its principal place of business is in Canada. Precision Drilling Corporation does not have any offices or employees in Pennsylvania. No decisions regarding the operations or management of Precision Drilling Corporation are made from Pennsylvania.

4. Precision Drilling Corporation does not have any employees. Therefore, no employee or officers of Precision Drilling Corporation were on site on the day of the incident giving rise to this lawsuit.

5. Precision Drilling Corporation did not do any business in Pennsylvania and was not involved in the incident given rise to this lawsuit. The Precision entity on site on the day of the incident was Precision Drilling Company, LP, and Precision Drilling Corporation did not oversee, direct, or manage the operations on site.

Mike Skuce

MIKE SKUCE